

REMARKS

The Official Action mailed February 3, 2005, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Accordingly, the Applicants respectfully submit that this response is being timely filed.

The Applicants note with appreciation the consideration of the Information Disclosure Statements filed on May 9, 2001, October 3, 2001, September 22, 2003, and December 10, 2004.

Claims 33-44 and 55-60 are pending in the present application, of which claims 33, 55, 57 and 59 are independent. The Applicants note with appreciation the allowance of claims 33-44, 59 and 60 (page 4, Paper No. 20050131). For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

Paragraph 3 of the Official Action rejects claims 55-58 as obvious based on the combination of U.S. Patent No. 5,793,344 to Koyama and U.S. Patent No. 6,040,826 to Furukawa. The Applicants respectfully traverse the rejection because the Official Action has not made a *prima facie* case of obviousness.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of

one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

There is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Koyama '344 and Furukawa or to combine reference teachings to achieve the claimed invention. MPEP § 2142 states that the examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. It is respectfully submitted that the Official Action has failed to carry this burden. While the Official Action relies on various teachings of the cited prior art to disclose aspects of the claimed invention and asserts that these aspects could be used together, it is submitted that the Official Action does not adequately set forth why one of skill in the art would combine the references to achieve the features of the present invention.

The test for obviousness is not whether the references "could have been" combined or modified as asserted in the Official Action, but rather whether the references should have been. As noted in MPEP § 2143.01, "The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination." In re Mills, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) (emphasis in original). Thus, it is respectfully submitted that the standard set forth in the Official Action is improper to support a finding of *prima facie* obviousness.

The Official Action concedes that Koyama '344 does not teach "the signal flow wherein an image signal is transferred to said memory control circuit, from said memory control circuit to said memory portion, and from said memory portion to said data line side drive circuit" (page 3, Paper No. 20050131). The Official Action relies on column 6, lines 30-55 and Figure 3 of Furukawa to allegedly teach the above-referenced features

missing from Koyama '344. The Official Action asserts that it "would have been obvious to [one] of ordinary skill in the art at the time of the invention to provide to the device as taught by Koyama the feature as taught by Furukawa in order to interconnect the elements mounted on the said substrate in the manner necessary to control the data flow from the image signal from the input, through the memory control circuit into the memory unit and onto the data line said driver circuit" (page 4, Id.). The Applicants respectfully disagree and traverse the above assertions in the Official Action.

Initially, it is noted that the Official Action provides no support from either reference to explain how or why it would have been obvious to combine Koyama '344 and Furukawa. The Applicants respectfully submit that there is no proper motivation to combine Koyama '344 and Furukawa, because Koyama '344 and Furukawa are directed to completely different circuits. The broad assertion, "in order to interconnect the elements mounted on the said substrate in the manner necessary to control the data flow from the image signal from the input, through the memory control circuit into the memory unit and onto the data line said driver circuit," does not explain why it would have been obvious to combine these references.

Specifically, Koyama '344 is generally directed to a display device having a nonvolatile memory device, such as an active matrix type liquid crystal display device, where display contents displayed on the display device are obtained by a camera device, the obtained information (corresponding to the display contents) is digital-converted and then processed to detect a defect and a nonuniformity on the display device, so that correction information is produced. In contrast, Furukawa is generally directed to a driving circuit for a simple matrix type display apparatus in which an input data signal is stored in a frame buffer and subjected to orthogonal transformation, whereby a display is performed. The Official Action appears to rely on Koyama '344 to teach a LCD device 110/620 having an active matrix portion 111/621, a gate driver 112/622, a source driver 113/623, a memory controller 114/624, a memory device (a correction memory 115/625), a correction processor 116/626, an analog/digital (A/D)

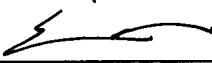
converter 117/627, a synchronous divider 118/628, a clock generator 119/629 and a digital/analog (D/A) converter 120/630 (Figures 1 and 6). The Official Action asserts that "the image signal comes into the line buffer (item 2) portion of the memory control circuit (item 4), from the memory control circuit to said memory portion (item 3), and from said memory portion to said data line side driver circuit (item 6)" (page 3, Paper No. 20050131). It is noted that Furukawa teaches "line buffers 2 and the frame buffer 3 controlled by memory control circuit 4" (column 6, lines 41-42) and it does not appear that the line buffer 2 is a "portion of the memory control circuit (item 4)" as asserted in the Official Action. In any event, the Official Action does not explain how or why one of ordinary skill in the art would have been motivated to combine the LCD device 110/620 of Koyama '344 with the line buffers 2, frame buffer 3, memory control circuit 4, and data signal driver 6 of Furukawa. Specifically, it is unclear which portions of Koyama '344 would be replaced by portions of Furukawa, and it is unclear why such replacements would have been obvious.

In the present application, it is respectfully submitted that the prior art of record, either alone or in combination, does not expressly or impliedly suggest the claimed invention and the Official Action has not presented a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.

For the reasons stated above, the Official Action has not formed a proper *prima facie* case of obviousness. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



Eric J. Robinson
Reg. No. 38,285

Robinson Intellectual Property Law Office, P.C.
PMB 955
21010 Southbank Street
Potomac Falls, Virginia 20165
(571) 434-6789